BEFORE THE CALIFORNIA ENERGY COMMISSION

Draft Second Electric Program Investment Charge (EPIC) Investment Plan (2015-2017)

Docket Number 12-EPIC-01

ADDITIONAL COMMENTS OF BIDGELY, INC

Bidgely, Inc., a Sunnyvale, California, emerging growth startup committed to helping customers save energy and money by developing new energy efficiency technologies that leverage California's investments in its Advanced Metering Infrastructure ("AMI"), submitted comments March 28, 2014, regarding the California Energy Commission's draft *2015-2017 Electric Program Investment Charge (EPIC) Program-Second Triennial Investment Plan* ("Draft Plan"). We have reviewed the *Final Staff Report, The Electric Program Investment Charge: Proposed 2015-2017 Triennial Investment Plan* noticed Thursday, April 10, 2014 ("Final Report").

Bidgely believes that the Final Report represents an improvement over the Draft Plan and very much appreciates the efforts of staff to strengthen the research, development and deployment initiatives. In the event that additional changes are considered to the Final Report, Bidgely suggests one additional clarification that would be helpful. In its March 28 comments, Bidgely had pointed out that California has made a significant investment in Advanced Metering Infrastructure, and in policies that allow customers to obtain and use their personal energy usage data enabled by the meters, which we believe will enable technologies – like disaggregation – capable of enabling much greater customer savings than are achievable from tools currently deployed. [1] The Commission's research and development initiatives recognize this potential, but given the fact that in-home technologies are rapidly evolving and the Investment Plan covers a span of three years, it would seem prudent to explicitly mention their potential as an option in the more widespread deployment initiatives.

Bidgely had urged the Commission to consider demonstration and deployment for gateway devices, those devices that enable customers to receive direct, real-time data from their smart meter. This recommendation did not reference Section 12.1. Bidgely has reviewed the revised 12.1, which "emphasizes large-scale demonstrations and deployment that may involve multiple residential and

[1] http://bidgely.com/press

commercial building owners/developers, IOUs, major manufacturers, regulators and other research organizations" and suggests that "*gateways*" that leverage California's AMI infrastructure be added to the list of technologies listed in the third paragraph of page 123 of eligible product lines/technologies for which demonstration funds could be used. Arguably, gateways are already covered through the mention of "cost-effective retrofit technologies" or "other cost-effective technologies," but we would submit that the promise of AMI-enabled technologies such as gateways, or more generally, "HAN devices," is high enough that it would be helpful to provide explicit guidance.

California has invested over $3 billion in AMI. Initial reviews, including those from studies funded under the American Recovery and Reinvestment Act, in the field of leveraging AMI through in-home devices or web-based displays, appear promising.[2] We suggest that explicitly noting HAN devices as an option for the Commission's future consideration would be prudent and for that reason urge its consideration.

As previously mentioned, California has an important opportunity to leverage its investments in smart meters and lead the country in developing new approaches to achieve significantly higher rates of home energy efficiency than have yet been realized from existing software and data solutions. Bidgely appreciates the opportunity to provide these additional comments.

Dated: April 14, 2014

Respectfully submitted,

/s/
Matthew Plante
Vice President

[2] In our prior comments we noted estimates provide by the American Council for an Energy Efficient Economy finding efficiency savings of 12% from real-time data and feedback. See also the U.S. Department of Energy, *American Recovery and Reinvestment Act of 2009: Demand Reductions from the Application of Advanced Metering Infrastructure, Pricing Programs, and customer-Based systems – Initial Results*, December 2012, p. iii-iv. Oklahoma Gas and Electric reported peak reductions of up to 30% from a sample of about 6,000 mostly residential customers. Marblehead Municipal Lighting Department reported peak reductions among 500 residences of up to 37% and Sioux Valley Electric reported peak demand reductions among 600 mostly residential customers of between 5 and 25% during seven events. While these reductions are peak demand reductions, not overall efficiency gains, but in general, these appears to support the conclusions from ACEEE and others as to the efficacy of empowering consumers with access to real-time data and the technology tools and education needed